

EXHIBIT B

**UNITED STATES DISTRICT COURT FOR THE
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

VICTOR ELIAS PHOTOGRAPHY,
LLC,

Plaintiff,

v.

LEONARDO WORLDWIDE
CORPORATION and ICE PORTAL,

Defendants.

C.A. NO. 4:18-cv-02142

**DECLARATION OF HENRY WOODMAN IN SUPPORT OF
DEFENDANTS' MOTION TO DISMISS PLAINTIFF'S
COMPLAINT**

I, Henry Woodman, declare, pursuant to 28 U.S.C. § 1746, that:

1. I am the President of ICE Portal and have personal knowledge of the facts set forth herein. I make this declaration in support of Defendants' Motion to Dismiss Plaintiff's Complaint.

2. ICE Portal is a corporation incorporated under the laws of Florida.

3. ICE Portal maintains its principal place of business in Hollywood, Florida.

4. ICE Portal does not conduct any of its regular business activities in Texas.

5. ICE Portal does not have any offices, property, employees, or bank accounts located in Texas.

6. ICE Portal is not aware of any potential witnesses located in Texas who might have knowledge about the facts alleged in the Plaintiff's Complaint filed in this matter.

7. ICE Portal does not have any contractual relationship with Victor Elias or Victor Elias Photography, LLC that relates to the 194 photographs listed in Exhibit A attached to the Plaintiff's Complaint filed in this matter (the "Photographs").

8. ICE Portal has never obtained the Photographs or copies of the Photographs directly from Mr. Elias or Victor Elias Photography, LLC.

9. ICE Portal is in the business of providing platforms for hotels and resorts to manage their visual media and to connect with thousands of online travel agencies, global distribution systems, and Internet search sites throughout the world.

10. The customers that utilize the services of ICE Portal are primarily hotels and resorts.

11. ICE Portal does not own or operate Travelocity, Hotels.com, Expedia.com, or any other, similar travel reservation website from which Internet users book hotel reservations.

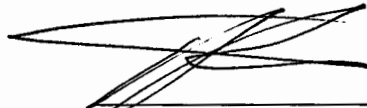
12. ICE Portal does not advertise its services on any hotel or online travel reservation websites.

13. ICE Portal does not engage in any commercial transactions with Internet users seeking to book hotel accommodations.

14. ICE Portal does not solicit or direct any marketing efforts to Internet users who are seeking to book hotel reservations online.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Dated: October 12, 2018


Henry Woodman